

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

FEDERAL TRADE COMMISSION,

Plaintiff

v.

DIRECT MARKETING CONCEPTS, INC., d/b/a  
TODAY'S HEALTH and DIRECT FULFILLMENT,  
ITV DIRECT, INC., d/b/a DIRECT FULFILLMENT,  
DONALD W. BARRETT,  
HEALTHY SOLUTIONS, LLC d/b/a DIRECT  
BUSINESS CONCEPTS,  
HEALTH SOLUTIONS, INC.,  
ALEJANDRO GUERRERO, a/k/a ALEX GUERRERO,  
MICHAEL HOWELL, GREG GEREMESZ,  
TRIAD ML MARKETING, INC., KING MEDIA, INC.,  
and ALLEN STERN,  
Defendants.

Civ. No. 04-11136 - GAO

**(PROPOSED) ORDER  
GRANTING FEDERAL TRADE COMMISSION'S MOTION FOR LEAVE  
TO NAME ADDITIONAL DEFENDANTS AND RELIEF DEFENDANTS AND  
TO FILE FIRST AMENDED COMPLAINT**

Upon consideration of plaintiff Federal Trade Commission's Motion for Leave to Name Additional Defendants and Relief Defendants and to File First Amended Complaint, materials submitted in support, and the record in this case, it is hereby

ORDERED AND ADJUDGED that the Commission's motion is hereby **GRANTED**;  
and it is further

ORDERED that the First Amended Complaint be filed and served; and it is further

ORDERED that responses to the First Amended Complaint be submitted no later than 10

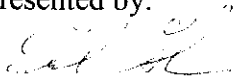
days after service.

**SO ORDERED** this \_\_\_\_\_ day of \_\_\_\_\_, 2004.

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UNITED STATES DISTRICT JUDGE  
GEORGE A. O'TOOLE

Presented by:



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DANIEL KAUFMAN  
KIAL S. YOUNG (BBO # 633515)  
EDWARD GLENNON  
Federal Trade Commission  
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Washington, DC 20580  
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[eglennon@ftc.gov](mailto:eglennon@ftc.gov)

ATTORNEYS FOR PLAINTIFF

Dated November 18, 2004

**CERTIFICATE OF SERVICE**

My name is Edward Glennon and I am an attorney with Federal Trade Commission. On November 18, 2004, copies of:

1. **FEDERAL TRADE COMMISSION'S MOTION FOR LEAVE TO NAME ADDITIONAL DEFENDANTS AND RELIEF DEFENDANTS AND TO FILE FIRST AMENDED COMPLAINT**
2. **FEDERAL TRADE COMMISSION'S MEMORANDUM IN SUPPORT OF MOTION FOR LEAVE TO NAME ADDITIONAL DEFENDANT AND RELIEF DEFENDANTS AND TO FILE FIRST AMENDED COMPLAINT**
3. **DECLARATION OF DANIEL KAUFMAN IN SUPPORT OF PLAINTIFF'S MOTION FOR LEAVE TO NAME ADDITIONAL DEFENDANT AND RELIEF DEFENDANTS AND TO FILE FIRST AMENDED COMPLAINT**
4. **(PROPOSED) ORDER GRANTING FEDERAL TRADE COMMISSION'S MOTION FOR LEAVE TO NAME ADDITIONAL DEFENDANTS AND RELIEF DEFENDANTS AND TO FILE FIRST AMENDED COMPLAINT**
5. **LOCAL RULE 15.1 DATE OF FILING STATEMENT**
6. **CERTIFICATE OF COMPLIANCE WITH LOCAL RULE 15.1**

along with attachments, were served via Federal Express as follows:

Becky V. Christensen, Esq. (for Michael Howell, Greg Geremesz, Health Solutions, LLC,  
Levin & O'Connor Alejandro Guerrero and Health Solutions, Inc.)  
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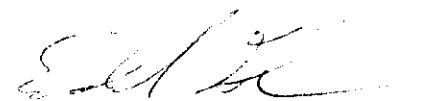
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Sage International, Inc. (Registered agent of BP International, Inc.)  
1135 Terminal Way  
Suite 209  
Reno, NV 89502

I declare under penalty of perjury that the foregoing is true and correct. Executed this November  
18, 2004 at Washington, D.C.



Edward Glennon